Curtis G. Manchester, Esq. (VSB No. 32696) Alison Wickizer Toepp, Esq. (VSB No. 75564) REED SMITH LLP Riverfront Plaza—West Tower 901 E. Byrd Street, Suite 1700 Richmond, VA 23219-4068

Telephone: (804) 344-3400 Facsimile: (804) 344-3410

Counsel to Northern Indiana Public Service Company

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

IN RE: Chapter 11

CIRCUIT CITY STORES, INC., et al., Case No. 08-35653-KRH

Debtors. (Jointly Administered)

ENTRY OF APPEARANCE AND REQUEST FOR NOTICES

Please take notice that the undersigned counsel hereby appears as counsel for Northern Indiana Public Service Company ("NIPSCO"), a creditor in the above-referenced case, and hereby requests, pursuant to Rule 9010 of the Federal Rules of Bankruptcy Procedure and Local Rule 2090-1, that copies of all notices and pleadings given or filed in this case be given and served upon counsel at the following address and telephone number:

Curtis G. Manchester (VSB No. 32696) Alison Wickizer Toepp (VSB No. 75564) Reed Smith LLP Riverfront Plaza - West Tower 901 East Byrd Street, Suite 1700 Richmond, VA 23219

Telephone: (804) 344-3400 Facsimile: (804) 344-3410 <u>cmanchester@reedsmith.com</u> atoepp@reedsmith.com

Counsel for Northern Indiana Public Service Company

Case 08-35653-KRH Doc 11905 Filed 05/03/12 Entered 05/03/12 14:29:39 Des

Please take further notice that the foregoing demand includes, without limitation, orders and any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced case and/or which affects the Debtor or property of the Debtor.

Neither this request nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive NIPSCO's (i) right to have final orders in non-core matters entered only after de novo review by a district judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which NIPSCO, is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Dated: May 3, 2012 Respectfully submitted,

REED SMITH LLP

By: <u>/s/Alison Wickizer Toepp</u>

Alison Wickizer Toepp (VSB No. 75564) Curtis G. Manchester (VSB No. 32696)

Riverfront Plaza—West Tower 901 E. Byrd Street, Suite 1700

Richmond, VA 23219-4068

atoepp@reedsmith.com cmanchester@reedsmith.com

Telephone: (804) 344-3400

Facsimile: (804) 344-3410

Counsel to Northern Indiana Public Service Company

- 2 -

US_ACTIVE-109349106

CERTIFICATE OF SERVICE

I hereby certify that on this the 3rd day of May, 2012, a true and correct copy of the foregoing was served electronically using the Court's CM/ECF system on all registered users of the CM/ECF system who have filed a notice of appearance in this matter and by first class U.S. mail, postage prepaid, upon the following counsel:

Jeffrey N. Pomerantz, Esq. Andrew W. Caine, Esq. PACHULSKI STANG ZIEHL & JONES LLP 10100 Santa Monica Boulevard Los Angeles, California 90067-4100

Robert J. Feinstein, Esq. PACHULSKI STANG ZIEHL & JONES LLP 780 Third Avenue, 36th Floor New York, New York 10017

/s/Alison Wickizer Toepp

Alison Wickizer Toepp (VSB No. 75564) Curtis G. Manchester (VSB No. 32696) Riverfront Plaza—West Tower 901 E. Byrd Street, Suite 1700 Richmond, VA 23219-4068 atoepp@reedsmith.com cmanchester@reedsmith.com Telephone: (804) 344-3400

Facsimile: (804) 344-3410

Counsel to Northern Indiana Public Service Company